

# EXHIBIT E

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER )  
 ) CIVIL ACTION NO.  
VS. ) 3:17-CV-02278-X  
 )  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

-----  
CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF  
MAUREEN EMLET  
NOVEMBER 5, 2020  
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ANSWERS AND DEPOSITION OF MAUREEN EMLET,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 5, 2020, at 9:03 a.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located in  
Aurora, Colorado, pursuant to the Federal Rules of  
Civil Procedure, the current emergency order  
regarding the COVID-19 State of Disaster, and the  
provisions stated on the record or attached hereto.

1                   Do you know if Audrey Stone ever  
2   reported another flight attendant for a policy  
3   violation?

4           A.   I don't know whether she did.

5           Q.   Do you know of a case where any union  
6   official ever reported an employee for a policy  
7   violation?

8           A.   I do.

9           Q.   Okay. And what do you recall?

10          A.   I recall that one union leader gave some  
11   social media screenshots to one of the labor  
12   relations managers and asked to remain anonymous.

13          Q.   Okay. To a labor relations manager, you  
14   said?

15          A.   Yes.

16          Q.   Okay. And who was that union leader?

17          A.   I don't know. He -- they didn't give that  
18   to me.

19          Q.   When you said they didn't give that to  
20   you, you mean the anonymous union leader?

21          A.   Correct.

22          Q.   So you knew that it was a union leader,  
23   though?

24          A.   Yes.

25          Q.   Okay. And how did you know it was a union

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1 leader?

2 A. Because the manager who received the  
3 information said it was.

4 Q. Okay. The -- the manager who received the  
5 information told you that they received information  
6 from a union leader?

7 A. Yes.

8 Q. Okay. And who was the labor relations  
9 manager; who told you that?

10 A. I think it was -- was Kevin.

11 Q. And what is Kevin's last name?

12 A. Let me tell you. Allen, A-l-l-e-n.

13 Q. Okay. Do you know what the information  
14 was that Kevin union -- I'm sorry -- Kevin Allen  
15 had received?

16 A. I don't remember what case it was.

17 Q. Okay. You don't remember the flight  
18 attendant who was being reported?

19 A. No.

20 Q. Okay. Do you remember when that was?

21 A. No, I don't. Two to three years ago.

22 Q. Okay. Do you know if Brian Talbert ever  
23 reported another flight attendant for a violation  
24 of one of Southwest's policies?

25 A. I believe he did, yes.

1 Q. Okay. And who did he report?

2 A. I don't remember.

3 Q. Do you remember what policy he reported  
4 the -- being violated?

5 A. I believe it was the social media policy.

6 Q. Okay. And do you remember when it was?

7 A. No.

8 Q. All right. Let's see. If I could mark as  
9 the next exhibit Document 26. I think it's Exhibit  
10 18.

11 (Exhibit 18 marked.)

12 Q. (By Mr. Gilliam) And, Ms. Emlet, if you  
13 could review this. And once you have had the  
14 chance to review it, let me know.

15 A. You say it's Document 18 or Exhibit 18?

16 Q. It -- it will be your Document 26.

17 A. I don't -- I don't think I have -- let's  
18 see. Oh, wait. Let's scroll down some more. More  
19 attachments. Okay.

20 Q. And -- and once you find it, review it.  
21 And once you have had the chance to review it, just  
22 let me know.

23 A. Okay.

24 Q. All right. And what is it? I am sorry.  
25 Do you recognize it?

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1 A. Yes.

2 Q. And what is it?

3 A. It's an email thread that, I believe,  
4 originated with Brian Talbert alleging that  
5 different flight attendants had violated the social  
6 media policy. And then there is a spreadsheet  
7 that, I think, Julie O'Grady put together with  
8 names of flight attendants who needed to be  
9 contacted and addressed regarding the posts.

10 Q. Okay. And who is Julie O'Grady?

11 A. She was one of the -- or is one of the  
12 senior investigators with employee relations.

13 Q. Okay. All right. And the -- the chart  
14 you referred to -- or I am not sure which word you  
15 used, but is -- is that on -- are you talking about  
16 the one on 6351 through 6354?

17 A. Yes.

18 Q. Okay. And there is a column that says  
19 time and -- well -- well, I guess, hold up on -- on  
20 that a little bit. I guess, going -- going back --  
21 I am sorry. Going back to 5680, the first page.

22 A. Okay.

23 Q. And there is an email from Julie O'Grady  
24 to -- to you and Melissa Burdine and a few others.  
25 Do you know if this was the first you -- you would

1           A. Well, Brian Talbert had brought forward a  
2 whole list of alleged social media violations. And  
3 so he -- and he brought his allegations to the  
4 employee relations team. So the -- employee  
5 relations, Brian and the base leader were working  
6 together to go through each of the allegations.

7           Q. Okay. And then moving to the next email,  
8 next page, 4483.

9           A. Yes.

10          Q. And Julie O'Grady sends you an email,  
11 along with several other persons. And it looks  
12 like you -- you forward the email; is that -- I --  
13 I guess, do you know when Julie sent you that  
14 email?

15          A. Well, not unless the date stamp is on  
16 here, but I don't see a date stamp on this email.

17          Q. Okay. Yeah, I didn't either. And Julie  
18 says, after doing some additional research on the  
19 information Brian forwarded us -- to us on  
20 Wednesday, I did not see any additional information  
21 to investigate from an employee relations  
22 standpoint. And I found that some of the posts  
23 were previously brought forward to the company and  
24 addressed.

25                           And then, I -- I guess, you forward it

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1 to a group of people and say, I am not sure how  
2 this will influence your investigation.

3 What -- what investigation were you  
4 referring to?

5 A. I believe it was the investigation of the  
6 -- the social media violation allegations on all of  
7 the flight attendants that were listed in the chart  
8 on this email thread.

9 Q. Okay. And who -- who are those people  
10 that you are sending it to?

11 A. Some of them were base managers and some  
12 of them were assistant base managers. And they  
13 were working at the bases of the flight attendants  
14 who had been accused of violating the policy.

15 Q. Okay. And which -- I guess, from  
16 reviewing the information here, which -- which  
17 bases were they from?

18 A. Well, I hope I remember. I think at the  
19 time, Joe was in Chicago. Brinkley Flanigan was  
20 Baltimore. Danielle Santiago was Baltimore. Brian  
21 Ridgeway, I believe, at this time, was senior  
22 manager over the Eastern region bases. Carolene  
23 Goulbourne was the manager in Oakland. Brett and  
24 Keith were assistant base managers in Oakland. And  
25 Dave Kissman was the senior manager over the



1 Western region of flight attendant bases.

2 Q. Okay. All right. Do you remember having  
3 any phone conversations with them about their  
4 investigations?

5 A. I don't remember.

6 Q. Okay. And let's see. Going back to 6351.

7 A. Yes.

8 Q. Now, I guess, Julie O'Grady, in her email,  
9 says, after review of the attached information,  
10 below are the names of the flight attendants, the  
11 time and date of their comments in 2014; and the  
12 comment they made on social media could be  
13 perceived as retaliatory in nature.

14 And I think she goes on to say,  
15 reposting messages related to the protected  
16 categories that are derogatory, negative or sexual  
17 in nature could be a violations (sic) of the  
18 company policy concerning harassment, sexual  
19 harassment, discrimination and retaliation.

20 Now, do you -- do you know if there  
21 was actually a final determination that it -- it --  
22 these posts that are listed in this table did  
23 violate that policy?

24 MR. CORRELL: Objection.

25 Mischaracterizes the exhibit. You can answer as

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1 you are able, Ms. Emlet.

2 A. I don't know who or if anybody received  
3 discipline as a result of -- of these  
4 investigations.

5 Q. (By Mr. Gilliam) Okay. And do you know  
6 if -- if any of these posts were deemed to violate  
7 one of Southwest's policies?

8 A. I don't know.

9 Q. Okay. Do you know who reached the -- I  
10 guess, the -- the decision on whether to issue  
11 discipline for these cases?

12 A. Each of the decisions would have been made  
13 separately by the base leader where that flight  
14 attendant was domiciled.

15 Q. Okay. And -- that exhibit -- okay. Now,  
16 were you involved in -- or I am sorry.

17 Were you aware of any cases where  
18 flight attendants were reported for their social  
19 media activities during a union campaign?

20 A. I -- I don't know. I don't remember.

21 Q. Okay. And are you aware if anyone --  
22 well, I guess, first of all, do you know who [REDACTED]  
23 [REDACTED] is?

24 A. Yes.

25 Q. And who is [REDACTED]

1           A. I -- I don't know if he is still with the  
2 company, but when I retired, he was a flight  
3 attendant based out of Oakland.

4           Q. Okay. Do you know -- or I am sorry.

5                       Are you aware if anyone ever reported  
6 [REDACTED] for Facebook posts he made?

7           A. Yes.

8           Q. Okay. And what -- what do you remember  
9 about [REDACTED] being reported for Facebook posts?

10          A. I don't remember any details about what  
11 was posted or what the allegations were, but I do  
12 know that he was reported to have allegedly  
13 violated the social media policy.

14          Q. Okay. Do you know who reported him?

15          A. I don't remember.

16          Q. Okay. If I could mark as Exhibit 19,  
17 Document 23. Ms. Emlet, if you want to turn to  
18 that.

19                       (Exhibit 19 marked.)

20          Q. (By Mr. Gilliam) And take an opportunity  
21 to review it. And once you have had a chance to  
22 review it, I will ask some questions.

23          A. Okay.

24          Q. All right. Do you recognize this?

25          A. I don't remember it, but I -- I recognize

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1 the format.

2 Q. Okay. Do you know what it is?

3 A. Yes. It -- it looks like it's an email  
4 from me.

5 Q. Okay. And you -- I think you -- you sent  
6 it to Brianna Grant. And it says, I couldn't find  
7 much with [REDACTED]'s name on it, but I am happy to keep  
8 looking if you like.

9 Do you recall what she had asked you  
10 to look for?

11 A. No.

12 Q. Okay. And, I -- I guess, the [REDACTED]  
13 mentioned here, that -- is that [REDACTED]?

14 A. Yes.

15 Q. Okay. Okay. And what did Brianna, I  
16 guess, say to you when, I guess, you emailed and  
17 asked for -- asked if you want to dig deep -- if  
18 she wanted you to dig deeper?

19 A. I have no idea.

20 Q. Okay. Do you know if she responded to  
21 you?

22 A. I -- I don't know.

23 Q. Okay. And you say you did take  
24 screenshots of his most recent posts. Do you  
25 remember being out on his Facebook page looking for

1 posts?

2 A. I don't remember doing that, but it's --  
3 it says in the email that I did.

4 Q. Uh-huh. And you -- you also say, I think  
5 there is an interesting pattern of trying to milk  
6 the company for money.

7 What -- what are you referring to when  
8 -- when you mention that pattern of --

9 A. I --

10 Q. -- milking the company?

11 A. I don't remember.

12 Q. Okay. Let's see. If -- at -- let's see.  
13 6346, still part of this document.

14 A. Okay. My last number is cut off, so can  
15 you tell me what is at the top of the page that you  
16 are referencing?

17 Q. It looks like a screenshot of a post. It  
18 has [REDACTED] name on it and then it has a  
19 picture of a plane and a clock.

20 A. Okay. Okay. I have it.

21 Q. Okay. And did you read it?

22 A. Yes.

23 Q. Okay. Is -- could this be what you were  
24 referring to when you said there is a pattern of  
25 trying to milk the company for money?

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1 MR. CORRELL: Objection. Calls for  
2 speculation. You can answer as you are able,  
3 Ms. Emlet.

4 A. I -- I don't see anything here that would  
5 suggest he was trying to milk the company for  
6 money.

7 Q. (By Mr. Gilliam) Okay. All right. And  
8 then if you could -- have you turn to 6345.

9 A. Yes.

10 Q. Okay. And you care to review those  
11 messages?

12 A. Yes.

13 Q. And is this the post you were referring to  
14 or are these the posts you were referring to when  
15 you said there is an interesting pattern of trying  
16 to topple the union?

17 A. I don't remember what I was referring to  
18 in that email.

19 Q. Okay. All right. Now, the -- these  
20 Facebook posts -- well, let me ask it this way:  
21 The documents numbered 6323 to 6350, were those  
22 attachments to this email you sent to Brianna?

23 A. I can't tell for sure whether they were or  
24 not because at the top of the email, it says that  
25 there are attachments, but I don't know if the --